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6 Attorneys for Defendant
EDGAR BARRERA

7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 EDGAR BARRERA,

15 Defendant.

Case No. 1:19-cr-00275-NONE-SKO

STIPULATION TO CONTINUE STATUS
CONFERENCE; ORDER

Date: June 1, 2020

Time: 1:00 p.m.

Judge: Hon. Sheila K. Oberto

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17 **IT IS HEREBY STIPULATED** by and between the parties through their respective
18 counsel, JOSEPH BARTON, Assistant United States Attorney, counsel for plaintiff, and
19 PEGGY SASSO, Assistant Federal Defender, counsel for defendant Edgar Barrera, that the
20 status conference scheduled for April 20, 2020 may be continued to **June 15, 2020, at 1:00 p.m.**

21 On April 15, 2020, the government provided defense counsel with a plea agreement. On
22 April 16, 2020, defense counsel began a telephonic conversation with Mr. Barrera regarding the
23 offer but the jail phone cut off after twenty minutes. Because more time is needed for plea
24 negotiations and for defense counsel to communicate with her client, the parties respectfully
25 request that Mr. Barrera's first status conference be continued until June 1, 2020.

26 The parties agree that the time resulting from the continuance shall be excluded until,
27 June 15, 2020, in the interests of justice, including but not limited to, the need for the period of
28 time set forth herein for effective defense preparation, defense investigation, and plea negotiation

1 purposes pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv). The parties
2 further agree that the ends of justice served by taking this action outweigh the best interest of the
3 public and the defendant in a speedy trial.

4
5 Respectfully submitted,

6 MCGREGOR W. SCOTT
7 United States Attorney

8 DATED: April 16, 2020

By: /s/ Joseph Barton
9 Joseph Barton
10 Assistant United States Attorney
11 Attorney for Plaintiff

12 HEATHER E. WILLIAMS
13 Federal Defender

14 DATED: April 16, 2020

By: /s/ Peggy Sasso
15 Peggy Sasso
16 Assistant Federal Defender
17 Attorney for Defendant
18 Edgar Barrera

19
20 **ORDER**

21 IT IS SO ORDERED.

22 Dated: **April 16, 2020**

/s/ Sheila K. Olerto
23 UNITED STATES MAGISTRATE JUDGE
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